

Honorable Alex G. Tse
United States Magistrate Judge
For the Northern District of California
450 Golden Gate Avenue
San Francisco, California 94102

May 18, 2022

Re: *Nacarino v. Chobani, LLC*, Case No. 3:20-cv-07437-EMC (AGT)

Dear Judge Tse:

In accordance with Your Honor's April 29, 2022 Discovery Order (Dkt. No. 82), the parties jointly submit this letter to respectfully request that this Court extend Chobani's May 20, 2022 deadline for ESI production.

On April 29, 2022, this Court ordered Chobani to "produce the ESI it finds and tell plaintiff which custodians and search terms it used" by May 20, 2022. (*Id.*, at 3.) The parties understand this to require Chobani to complete its document production by May 20, 2022. Due to the volume of data for processing and review, however, Chobani is unable to complete its production of documents by May 20, 2022.

On May 13, 2022¹, the parties met and conferred regarding the ESI deadline and agreed to continue the May 20, 2022 ESI deadline by 30 days, until Monday, June 20. The parties agreed to further meet and confer if additional time to produce ESI is needed.

Accordingly, the parties jointly request that this Court's May 20, 2022 deadline be extended until June 20, 2022.

Thank you for Your Honor's time and consideration of this request.

Dated: May 18, 2022

MORRISON & FOERSTER LLP

By: /s/ Claudia M. Vetesi
CLAUDIA M. VETESI

Attorneys for Defendant
CHOBANI LLC

Dated: May 18, 2022

REESE, LLP

By: /s/ Sue J. Nam
SUE J. NAM

Attorneys for Plaintiff
ELENA NACARINO

¹ Counsel with authority for Plaintiff and Chobani met and conferred on May 13, 2022 but did so telephonically due to technical issues with video conferencing.

IT IS ORDERED that the forgoing Agreement is approved.

Dated:

HONORABLE ALEX G. TSE
UNITED STATES MAGISTRATE JUDGE

ATTESTATION

I, Claudia M. Vetesi, am the ECF User whose identification and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that the concurrence in the filing of the document has been obtained from the other signatory.

By: /s/ Claudia M. Vetesi